

1 JOSEPH R. ASHBY (SBN 248579)

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5 *Attorneys for Defendants,*
6 *Business Financial Solutions Advisory*
7 *LLC, Ryan Carroll, Max K. Day,*
8 *Max O. Day, Michael Day, Dreams To*
9 *Reality LLC, Evo Maxx LLC, HouTex*
10 *Farm Equity Partners LLC, MKD Family*
11 *Beneficiary, LLC, MKD Family Private*
12 *Management Company, LLC, MKD*
13 *Investment Advisor, LLC, Max Day*
14 *Consulting, LLC, Precision Trading*
15 *Group, LLC, Providence Oak Properties,*
16 *LLC, WA Amazon Seller LLC, WA*
17 *Distribution LLC, WWKB LLC, Yax*
18 *Ecommerce LLC, Yax IP and Management*
19 *Inc.*

13 **UNITED STATES DISTRICT COURT**

14 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

16 DAVID HOUGH; et al.,

17 Plaintiff,

18 vs.

19 RYAN CARROLL; et al.,

20 Defendant.

Case No.: 2:24-cv-02886-WLH

**DECLARATION OF JOSEPH R.
ASHBY IN SUPPORT OF
STIPULATION TO EXTEND THE
HEARING DATE ON
DEFENDANTS' MOTION TO
DISMISS AND RELATED
DEADLINES [ECF NO. 93]**

[Stipulation and [Proposed] Order filed
concurrently]

Judge: Hon. Wesley L. Hsu

DECLARATION OF JOSEPH R. ASHBY

I, Joseph R. Ashby, declare as follows:

1. I am an attorney duly licensed to practice before this Court and I am a principal attorney at Offit Kurman, P.C., attorneys of record for defendants Business Financial Solutions Advisory LLC, Ryan Carroll, Max K. Day, Max O. Day, Michael Day, Dreams To Reality LLC, Evo Maxx LLC, HouTex Farm Equity Partners LLC, MKD Family Beneficiary, LLC, MKD Family Private Management Company, LLC, MKD Investment Advisor, LLC, Max Day Consulting, LLC, Precision Trading Group, LLC, Providence Oak Properties, LLC, WA Amazon Seller LLC, WA Distribution LLC, WWKB LLC, Yax Ecommerce LLC, Yax IP and Management Inc., (collectively, "Defendants") in this action.

2. I have personal knowledge of the facts stated herein, and if called to testify, I could and would do so competently.

3. I make this declaration in support of the Stipulation to Extend the Hearing Date on Defendants' Motion to Dismiss and related deadlines [ECF No. 93].

4. On August 22, 2024, I appeared on behalf of Defendants [ECF No. 125].

5. Some of the Defendants currently represented by Lloyd Mousilli and Offit Kurman, PC are in the process of retaining new counsel.

6. The requested stipulation to extend the briefing schedule is a good faith effort to allow for the orderly substitution of counsel.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this October 25, 2024 at Glendale, California.

/s/ Joseph R. Ashby

JOSEPH R. ASHBY